

Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)

Grantees eligible to receive funds under the Homelessness Prevention and Rapid Re-Housing Program (HPRP) are required to complete a substantial amendment to their Consolidated Plan 2008 Action Plan. This form sets forth the required format for this substantial amendment. A completed form is due to HUD within 60 days of the publication of the HUD HPRP notice.

To aid grantees in meeting this submission deadline, the HPRP Notice reduces the requirement for a 30-day public comment period to no less than 12 calendar days for this substantial amendment. With this exception, HPRP grantees are required to follow their Consolidated Plan's citizen participation process, including consultation with the Continuum of Care (CoC) in the appropriate jurisdiction(s). Grantees are also required to coordinate HPRP activities with the CoC's strategies for homeless prevention and ending homelessness. To maximize transparency, HUD strongly recommends that each grantee post its substantial amendment materials on the grantee's official website as the materials are developed.

A complete submission contains the following three documents:

- 1) A signed and dated SF-424,
- 2) A completed form HUD-40119 (this form), and
- 3) Signed and dated General Consolidated Plan and HPRP certifications.

For additional information regarding the HPRP program, visit the HUD Homelessness Resource Exchange (www.hudhre.info). This site will be regularly updated to include HPRP resources developed by HUD and its technical assistance providers.

The information collection requirements contained in this application have been submitted to the Office of Management and Budget (OMB) for review under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520). This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid OMB control number.

Information is submitted in accordance with the regulatory authority contained in each program rule. The information will be used to rate applications, determine eligibility, and establish grant amounts.

Public reporting burden for this collection of information is estimated to be 16 hours, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This information is required to obtain benefits. To the extent that any information collected is of a confidential nature, there will be compliance with Privacy Act requirements. However, the substantial amendment to the Consolidated Plan 2008 Action Plan does not request the submission of such information.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

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A. General Information

Grantee Name	State of Missouri
Name of Entity or Department Administering Funds	Missouri Department of Social Services, Family Support Division
HPRP Contact Person (person to answer questions about this amendment and HPRP)	Jeannie Chaffin
Title	Program Manager
Address Line 1	615 Howerton Ct
Address Line 2	P.O. Box 2320
City, State, Zip Code	Jefferson City, MO 65102
Telephone	573-751-6789
Fax	573-522-9557
Email Address	Jeannie.L.Chaffin@dss.mo.gov
Authorized Official (if different from Contact Person)	Linda Martinez
Title	Missouri Department of Economic Development
Address Line 1	301 W. High St.
Address Line 2	P.O. Box 1157
City, State, Zip Code	Jefferson City, MO 65101
Telephone	573-751-4962
Fax	573-526-7700
Email Address	Linda.Martinez@ded.mo.gov
Web Address where this Form is Posted	

Amount Grantee is Eligible to Receive*	\$12,011,262
Amount Grantee is Requesting	\$12,011,262

*Amounts are available at <http://www.hud.gov/recovery/homelesspreventrecov.xls>

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B. Citizen Participation and Public Comment

1. Briefly describe how the grantee followed its citizen participation plan regarding this proposed substantial amendment (limit 250 words).

Prior to developing the Draft Substantial Amendment to the Consolidated Plan, representatives of the State met with individuals having expertise and involvement in homelessness and housing and drafted the following guiding principles.

Guiding principles for the effective use of HPRP resources to prevent and end homelessness:

1. Resources should be targeted to households with the highest likelihood of becoming homeless.
2. Programs should provide just enough assistance to prevent or end an episode of homelessness stretching resources as far as possible.
3. Distribution of funds should achieve maximum access for needy Missourians while minimizing administrative costs as much as possible.
4. Other federal, state and local funds, including other ARRA funds must be coordinated.
5. HPRP funds should supplement and compliment existing programs. Subgrantees should have the infrastructure, capacity and experience to distribute funds rapidly to Missourians with housing needs that have been caused by the down turn in the economy.

These guiding principles were used by the State as the Homeless Prevention and Rapid Re-Housing Program was designed.

A Public Hearing Notice for HPRP and copy of the Draft Substantial Amendment to the State Consolidated Plan 2008 Action Plan were released on May 1, 2009, through local Community Action Agencies, Regional Planning Commissions, public libraries, and email blasts. The information was also made available online at the Department of Social Services website, www.dss.mo.gov and Governor Jeremiah W. (Jay) Nixon's Transform Missouri Initiative website, www.transform.mo.gov.

The Department of Social Services (DSS) conducted a public hearing on May 7, 2009, at the Harry S Truman Building, Conference Room 400, 301 West High Street, Jefferson City, MO 65101, at 2:30 p.m.

The public was given the opportunity to submit comments in writing to HPRP, P.O. Box 2320, Jefferson City, MO, 65102, or by email to FSD.HPRP.PROGRAM@DSS.MO.Gov.

The comment period regarding the Draft of Substantial Amendment closed on May 12, 2009.

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2. Provide the appropriate response regarding this substantial amendment by checking one of the following options:

- ☐ Grantee did not receive public comments.
☐ Grantee received and accepted all public comments.
☒ Grantee received public comments and did not accept one or more of the comments.

3. Provide a summary of the public comments regarding this substantial amendment. Include a summary of any comments or views not accepted and the reasons for non-acceptance.

See attachment A.

C. Distribution and Administration of Funds

Reminder: The HPRP grant will be made by means of a grant agreement executed by HUD and the grantee. The three-year deadline to expend funds begins when HUD signs the grant agreement. Grantees should ensure that sufficient planning is in place to begin to expend funds shortly after grant agreement.

1. Check the process(es) that the grantee plans to use to select subgrantees. Note that a subgrantee is defined as the organization to which the grantee provides HPRP funds.

- ☐ Competitive Process
☐ Formula Allocation
☒ Other (Specify: See Below_____)

A formula will be used for the initial allocation to counties, but will not include HUD direct funded communities. After the initial formula allocation distribution is complete, there may be counties that indicate they are not going to participate or designate another unit of local government to be the subgrantee. Funds that would have been allocated to these counties, plus the remaining funds will be allocated by the State through a second allocation distribution. To effect this second allocation, the State will use the same formula, a revised formula to reflect newer or more appropriate data, or a competitive process. For this second allocation, all HUD direct funded communities will be eligible in addition to the other counties. The amount of funding available and the need to allocate funds quickly, while keeping administrative costs low, will be among the factors considered when a final decision is made on the method for the second allocation.

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2. Briefly describe the process(es) indicated in question 1 above (limit 250 words).

The State of Missouri will use a formula to allocate funding to 113 counties in order to make funds widely available to all Missourians. The formula consists of the following elements: 50% poverty population, 25% food stamp usage, 25% unemployment. DSS staff modeled several different formula scenarios that included various mixes of population, poverty population, food stamp usage, and unemployment. The selected formula was one that resulted in the least deviation from an average of all the modeled formulas and it included unemployment, which is appropriate considering the goals and objectives of the ARRA.

The State of Missouri is selecting not to include the HUD direct funded communities of Kansas City, Springfield, St. Louis City, St. Joseph and St. Louis County in the initial formula allocation. However, as indicated in item C.1. above a second allocation will include all HUD direct funded communities in addition to the other counties.

The formula method will bring HPRP funding to the widest population of low-income families, homeless families and others with risk factors including, but not limited to persons with the following conditions or circumstances: eviction notice within 2 weeks, discharged from an institution, sudden and significant loss of income, mental health and substance abuse issues, physical disabilities and other chronic health issues, experienced homelessness in last 12 months, young pregnant women or teenagers, and extremely low-income.

Counties in collaboration with local partners will make the determination how to distribute funding allocated to a county. County staff are closer and know more about the local needs, providers, and resources in their communities; therefore, they can make allocation decisions that will best respond to the needs of the local community.

3. Briefly describe the process the grantee plans to use, once HUD signs the grant agreement, to allocate funds available to subgrantees by September 30, 2009, as required by the HPRP Notice (limit 250 words).

DSS will notify each county via an announcement that will include information on the amount available to the county based on the formula and requirements for receiving the HPRP grant. The letter will request counties submit a letter of intent declaring their willingness to participate.

Counties will have an option to designate another unit of local government to act as the subgrantee for the county. To facilitate local and regional needs, the State will provide counties the option of joining together in a multi-county or regional application. In these instances, the counties must declare their intent to cooperate, submit a combined application and designate a county or other local unit of government as the lead subgrantee. All funds allocated by formula to the

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participating counties will be eligible under the multi-county application. DSS will approve the cooperative application.

The State of Missouri will prepare and distribute a funding application. All participating counties will be required to identify their subgrantees and outline their program. Counties will be required to provide information on how they intend to meet accountability, monitoring and reporting requirements.

The State of Missouri will review each application and resolve any outstanding issues. Contracts with counties or other designated units of local government will be issued by the State and funds will be obligated before September 30, 2009.

4. Describe the grantee's plan for ensuring the effective and timely use of HPRP grant funds on eligible activities, as outlined in the HPRP Notice. Include a description of how the grantee plans to oversee and monitor the administration and use of its own HPRP funds, as well as those used by its subgrantees (limit 500 words).

The State of Missouri will issue contracts with local units of governments by September 30, 2009, for one year with the option of one or two year renewals. By executing contracts in this manner, the State will be able to take necessary actions to ensure that 60% of funds are expended within two years and 100% funds expended in three years. The State will reserve the right in subgrantee contract documents to review spending and recapture and redistribute funding to meet HUD's requirements for obligating and expending. Contract performance will be monitored closely by State staff and/or a State approved entity using a combination of monthly desk monitoring and on-site monitoring.

The Recovery Act requires that data collection and reporting for the HPRP be conducted using a Homeless Management Information System (HMIS). The State will work with Missouri's Continuum of Care groups to achieve subgrantee and sub-recipient participation in the accepted Continuum of Care Homeless Management Information System.

D. Collaboration

1. Briefly describe how the grantee plans to collaborate with the local agencies that can serve similar target populations, which received funds under the American Recovery and Reinvestment Act of 2009 from other Federal agencies, including the U.S. Departments of Education, Health and Human Services, Homeland Security, and Labor (limit 250 words).

Missouri's HPRP application will include a requirement for local subgrantees to identify a community planning process to make sure collaboration and planning take place at the local level as subrecipients are selected. This planning is necessary to prevent duplication and waste, and assure subgrantees that have the capacity to provide eligible services are funded.

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The application will suggest communities use the most appropriate method for planning which could be Continuum of Care, or other planning process, which should include a broad group of stakeholders. DSS will suggest that United Way organizations could be helpful in organizing local stakeholders.

2. Briefly describe how the grantee plans to collaborate with appropriate Continuum(s) of Care and mainstream resources regarding HPRP activities (limit 250 words).

Missouri has eight Continua of Care Regions; St. Joseph, Kansas City, Joplin, Springfield, St. Louis County, St. Louis City, St. Charles and Balance of State. As indicated previously, the State of Missouri will designate counties to assume responsibility for coordination with local community planning efforts. The State of Missouri will make it clear in scope of work and through contract documents that subgrantees shall conduct local community planning that prevents duplication and aligns HPRP activities with the Continuum of Care strategies for preventing and ending homelessness.

Subgrantees will be required to coordinate with other ARRA funds and existing funds such as the Community Services Block Grant (CSBG), Emergency Food and Shelter Grant Program (EFSGP), Continuum of Care (CoC), Emergency Shelter Grant (ESG), Low-Income Home Energy Assistance Program (LIHEAP), Missouri Housing Trust Fund (MHTF) and Housing Choice Voucher.

3. Briefly describe how HPRP grant funds for financial assistance and housing relocation/stabilization services will be used in a manner that is consistent with the grantee's Consolidated Plan (limit 250 words).

The State of Missouri has established the following priorities for the FFY2008 – 2012 Consolidated Plan:

- Affordable housing for low-income families,
- Affordable housing for homeless families and families with other special needs,
- Affordable homeownership for low and moderate income families,
- Preservation of affordable housing for low-income persons and families, and
- Affordable housing for the elderly.

Financial assistance and housing relocation and stabilization services will help address the State of Missouri's priorities in the areas of affordable housing for low-income families, homeless families, the elderly and families with other special needs. HPRP funds will enhance and increase the strategies outlined in the Consolidated Plan.

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Missouri's HPRP application and contract documents will contain information reiterating the eligible activities, eligibility criteria, and policy stated in the Department of Housing and Urban Developments, Notice of Allocations, Application Procedures, and Requirements for Homelessness Prevention and Rapid Re-Housing Program Grantees under the American Recovery and Reinvestment Act of 2009, published March 19, 2009.

Missouri's Plan will encourage subgrantees to focus higher levels of assistance to individuals and families that have multiple risk factors.

Missouri proposes using the eligibility criteria that households must be at or below 50 percent of the Area Median Income (AMI).

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E. Estimated Budget Summary

HUD requires the grantee to complete the following table so that participants in the citizen participation process may see the grantee's preliminary estimated amounts for various HPRP activities. Enter the estimated budget amounts for each activity in the appropriate column and row. The grantee will be required to report actual amounts in subsequent reporting.

HPRP Estimated Budget Summary			
	Homelessness Prevention	Rapid Re- housing	Total Amount Budgeted
Financial Assistance ¹	\$2,727,675.00	\$2,727,675.00	\$5,455,350.00
Housing Relocation and Stabilization Services ²	\$2,727,674.00	\$2,727,675.00	\$5,455,349.00
Subtotal (add previous two rows)	\$5,455,649.00	\$5,455,350.00	\$10,910,699.00

Data Collection and Evaluation ³	\$500,000.00
Administration (up to 5% of allocation)	\$600,563.00
Total HPRP Amount Budgeted⁴	\$12,011,262.00

¹Financial assistance includes the following activities as detailed in the HPRP Notice: short-term rental assistance, medium-term rental assistance, security deposits, utility deposits, utility payments, moving cost assistance, and motel or hotel vouchers.

²Housing relocation and stabilization services include the following activities as detailed in the HPRP Notice: case management, outreach, housing search and placement, legal services, mediation, and credit repair.

³Data collection and evaluation includes costs associated with operating HUD-approved homeless management information systems for purposes of collecting unduplicated counts of homeless persons and analyzing patterns of use of HPRP funds.

⁴This amount must match the amount entered in the cell on the table in Section A titled "Amount Grantee is Requesting."

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F. Authorized Signature

By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete, and accurate to the best of my knowledge. I also provide the required assurances and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

Signature/Authorized Official

Date

Title